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May 6, 2021

VIA ECF

Hon. Margo K. Brodie
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room N 626
Brooklyn, NY 11201

Re: Klimovitsky v. JG Innovative Industries, Inc., et al.
Case No. 21-CV-755 (MKB)(RER)

Dear Judge Brodie:

This firm represents the defendants in the above-referenced action. Pursuant to Your Honor's April 30th Order, the parties hereby propose the following deadlines for this case:

Plaintiff files amended complaint	May 24, 2021
Defendants file motion to dismiss	June 7, 2021
Plaintiff files opposition papers	June 21, 2021
Defendants file reply papers	July 1, 2021

The parties thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/Nils C. Shillito

Nils C. Shillito (NS-6755)

cc: Shalom Law, PLLC (via ecf)